

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

DAVID JAWORSKI, SARAH KROTH,)	
MAGGIE “MARS” ROBINSON, PATRICK)	
ROMANO,)	
)	
Plaintiffs,)	23-cv-2240
)	
v.)	
)	Honorable Nancy L. Maldonado
CITY OF CHICAGO, SGT. JAMES)	
TRIANAFILLO, #264, LUIS LAURENZANA,)	
#19637, DAVID FLOYD, #13262,)	Magistrate Jeffrey T. Gilbert
LEONARD SHOSHI, #236, CHARLES)	
FLASTER, #15498, and)	
SUPERINTENDENT BROWN)	
)	
Defendants.)	

**JOINT STATUS REPORT ON PROPOSED
CASE MANAGEMENT SCHEDULE**

Defendants propose to bifurcate and stay *Monell* discovery in this case (and all other severed cases) pending resolution of Plaintiffs’ claim against the individual defendant officers. Plaintiffs oppose any bifurcation and/or stay of *Monell* discovery in this case (and all other severed cases).

Plaintiffs propose the following discovery schedule for all discovery. Defendants propose the same discovery schedule for non-*Monell* discovery:

Event	Deadline
Rule 26(a)(1) Disclosures	August 19, 2023
Initial Discovery Responses	November 19, 2023

Amendment to the pleadings	December 19, 2023
Service of process on any “John Does” ¹	February 19, 2024
Completion of Fact Discovery	June 28, 2024
Disclosure of Plaintiff’s Expert Report(s)	July 29, 2024
Deposition of Plaintiff’s Expert	August 28, 2024
Disclosure of Defendant’s Expert Report(s)	September 27, 2024
Deposition of Defendant’s Expert	October 28, 2024
Dispositive Motions	December 13, 2024

Date: June 30, 2023

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¹ Defendants contend that any claims against “John Doe” defendants are barred by the statute of limitations.

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